## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2017-229-EG

In re:	)	
Nancy Hammack, Complainant/Petitioner,	) ) )	AFFIDAVIT OF ROBERT G. MORELAND
v.	)	
Duke Energy Carolinas, LLC and Piedmont Natural Gas Company,	)	
Defendants/Respondents.	) )	

PERSONALLY appeared before me, Robert G. Moreland, who first being duly sworn did state as follows:

- 1. My name is Robert G. Moreland and I am Carolina AMI Project Director for Duke Energy Carolinas, LLC ("Duke Energy Carolinas" or "DEC"). My office is located in 400 South Tyron, Charlotte, NC 28202. I have worked for DEC since 2001. I received a Bachelor of Science in Computer Science for Business from DeVry Institute of Technology, Atlanta GA. I have held my current position as Carolina AMI Project Director since July 2012.
- 2. This affidavit is based upon my personal knowledge and review of documents received and maintained in the ordinary course of business by Duke Energy Carolinas. I am familiar with the records of Duke Energy Carolinas that pertain to the residential account for 111 Arabian Way, Simpsonville, South Carolina (the "Residence"). I have personally worked on said documents and records, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Duke Energy Carolinas, which were made at or about the time of the events, recorded, and which are

maintained in the ordinary course of business by Duke Energy Carolinas. If called as a witness, I could and would testify to the same.

- 4. I assisted our attorneys in preparing Duke Energy Carolinas' Motion for Judgment as a Matter of Law and Memorandum in Support ("Motion"). I have read the Motion and verify that the information contained within the Motion is accurate and true to the best of my knowledge, information, and belief.
- 5. Beginning in 2002, DEC began exchanging analog meters with Automatic Meter Reading meters so that equipment installed in DEC trucks could gather kWh usage via the 900 MHz radio frequency signal. During this time DEC exchanged the analog meters with either a digital Automatic Meter Reading meter or an analog meter retrofitted with a radio transmitter inside (collectively "AMR Meters"). The radio transmitter is an Encoder Receiver Transmitter. DEC's records indicate that an analog meter retrofitted with a radio transmitter was installed at the Residence on October 6, 2003. This is meter number 16888885.
- 6. All AMR Meters are tested to confirm that they are in compliance with Federal Communications Commission ("FCC") rules and guidelines which sets exposure limits for all types of devices that emit electromagnetic frequencies. The FCC standards for intentional and unintentional radio emissions and safety related to RF exposure, Parts 1 and 2 of the FCC's Rules and Regulations (47 C.F.R. 1.1307(b), 1.1310, 2.1091, 2.1093) govern the certification and design of communicating meters and other devices such as cordless phones, remote control toys, personal computers, televisions, vacuum cleaners, among others. DEC's records confirm that the

7. In response to Ms. Hammack contacting DEC in April 2017 regarding concerns about Automated Metering Infrastructure ("AMI"), Ms Hammack was placed on the list to be temporarily bypassed for the installation of an AMI meter.

FURTHER AFFIANT SAYETH NOT.

Dated this 24th	day of	August	, 2017.
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**DUKE ENERGY CAROLINAS** 

Robert G. Moreland

Carolina AMI Project Director

SWORN TO BEFORE ME

\_\_ day of <u>August</u>

Notary Name: 🖰 🤸 Notary Public for \_